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OCTOBER 14, 2016

The Honorable J. Paul Oetken  
United States District Court for the Southern District of New York

Re: Williams v. City of N.Y. et al., No. 16 Civ. 233 (JPO)

Dear Judge Oetken:

I represent Plaintiff Rhonda Williams in the above-captioned Section 1983 police misconduct litigation which recently resulted in a Rule 68 Offer and related Judgment.

I write to respectfully ask that the Court extend the Parties' time under Rule 54(d)(2) to resolve related attorneys' fees and costs, until October 31, 2016. Defendants consent to this motion.

The Parties have been actively negotiating a settlement as to attorneys' fees and costs. On September 26, 2016, Plaintiff sent an invoice; on September 29, 2016, Plaintiff sent a revised invoice; and the Parties have had at least three telephone conferences about the matter in the days since.

At present the Parties are at an impasse in our negotiations but we hope that additional informal conference between us will resolve the dispute without the Court's intervention. If that is not true, then Plaintiff's counsel will either file a motion or the Parties will file a joint motion for settlement conference to bridge the gap (as to this latter suggestion, the Honorable Debra C. Freeman has been the designated magistrate judge in this case).

Thank you for your time. I am happy to provide additional information upon request.

Sincerely,

Ryan Lozar  
Attorney for Plaintiff Rhonda Williams